

05MBD 10114

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA

V.

ANTONIO FERREIRA

2005 MAR -9) P 12:59
U.S. DISTRICT COURT MR.B.D. NO.
DISTRICT OF MASS

05mc 10114

JOINT MOTION OF THE PARTIES TO EXCLUDE TIME

Defendant Antonio Ferreira is currently charged by complaint in 05-1034-JGD with making counterfeit immigration and identity documents and related crimes in violation of 18 U.S.C. §§ 1546(a), 1028(a)(6) and (f), and 371. The parties jointly move to exclude 45 days from the time within which the government would otherwise have to obtain an indictment or file an information. Ferreira first appeared before Magistrate Judge Dein on February 17, 2005. Preliminary discussions have begun in an effort to resolve this criminal proceeding by agreement of the parties. It is expected that the 45-day exclusion, commencing on March 20, 2005, and expiring on May 4, 2005, will permit the parties to reach such an agreement before the government is required to or inclined to seek an indictment.

Consequently, both parties move under 18 U.S.C. §3161(h)(8)(A), and §5(c)(1)(A) of Plan for Prompt Disposition of Criminal Cases that this Court find, based on the above, that the ends of justice served by granting the requested exclusion outweigh the best interest of the public and the defendant in a speedy trial, and, accordingly, exclude the requested 45 days in

computing the time within which an information or an indictment must be filed under 18 U.S.C. §3161(b).

Respectfully Submitted,

Antonio Ferreira
By His Attorney

Melvin Norris, Esq. (C.F.B.)
Melvin Norris, Esq.
Attorney for Defendant

MICHAEL J. SULLIVAN
United States Attorney

By:

C. F. Bator
CHRISTOPHER F. BATOR
Assistant U.S. Attorney
Date: 3/9/05